

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MASSACHUSETTS

VICTORIA GRETZKY,  
Plaintiff,  
  
v.  
AMGUARD INSURANCE COMPANY,  
Defendant.

CIVIL ACTION NO. 1:25-CV-10267-NMG

**PLAINTIFF VICTORIA GRETZKY'S OBJECTION TO DEFENDANT'S AMGUARD  
INSURANCE COMPANY'S MOTION TO LIMIT DAMAGES UNDER M.G.L. C. 93A, §  
9 (DOC. 20)**

Now comes Plaintiff, Victoria Gretzky, and hereby objects to Defendants' Motion to Limit Damages Under M.G.L. C. 93A § 9 (Doc. 20). The Plaintiff argues that AmGuard's settlement offer was unreasonable in relation to the injury suffered and that AmGuard engaged in willful and knowing violations of M.G.L. c. 176D, § 3(9)(f) by failing to effectuate a prompt and fair settlement when liability was reasonably clear. Accordingly, the Defendant's motion should be denied in its entirety.

Respectfully submitted:  
**DUDLEY DEBOSIER, APLC**

/s/ G. Adam Savoie  
**STEVEN A. DEBOSIER** (*Pro Hac Vice*)  
Louisiana Bar No. 22331  
**G. ADAM SAVOIE** (*Pro Hac Vice*)  
Louisiana Bar No. 32676  
1075 Government Street  
Baton Rouge, Louisiana 70802  
Telephone: (225) 343-2432  
Facsimile: (225) 379-4954  
Email: sdebosier@dudleydebosier.com  
Email: asavoie@dudleydebosier.com

**THE BOTTARO LAW FIRM LLC**

**GREGORY P. SORBELLO**

Massachusetts Bar No. (#653628)

**MICHAEL R. BOTTARO**

Massachusetts Bar No. (#665985)

756 Eddy Street

Providence, Rhode Island 02903

Telephone: (401) 383-5007

Facsimile: (401) 383-5005

Email: greg@bottarolaw.com

*Counsel for Plaintiff, Victoria Gretzky*

Dated: June 4, 2025

**CERTIFICATE OF SERVICE**

I, hereby certify that on June 4, 2025, I served a copy of the foregoing document, by causing a copy thereof to be sent electronically, through the ECF system, to the registered participants in this case, as identified on the Notice of Electronic Filing (NEF).

Lincoln A. Rose, Esq.  
Tamara Smith Holtslag  
Peabody & Arnold LLP  
Federal Reserve Plaza  
600 Atlantic Ave  
Boston, MA 02210  
Tel. (617) 951-2011  
[tsmith@peabodyarnold.com](mailto:tsmith@peabodyarnold.com)  
[Lrose@peabodyarnold.com](mailto:Lrose@peabodyarnold.com)

/s/Meghan McMullen